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7
8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,
11

12 Plaintiff,

13 v.

14 MICHAEL ZETO,
15

16 Defendant.

Case No. 2:22-cr-0085-GMN-DJA

**STIPULATION TO MODIFY
CONDITIONS OF RELEASE**

17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M.
18 Frierson, United States Attorney, and Department of Justice Trial Attorneys
19 Daniel E. Zytneck and Timothy T. Finley, counsel for the United States, and
20 Rene L. Valladares, Federal Public Defender, and Joanne L. Diamond, Assistant
21 Federal Public Defender, counsel for Michael Zeto, that the Court modify his
22 conditions of release to allow him contact with potential witness, Sherry Johnson,
23 under the condition that they not discuss the case.
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1 The Stipulation is entered into for the following reasons:

2 1. On April 21, 2022, the Court ordered Mr. Zeto's release on a personal
3 recognizance bond with certain conditions, including to avoid contact with any
4 potential victims or witnesses. ECF No. 14 at 5. The Court directed the government
5 to provide Mr. Zeto with a list of potential victims and witnesses. *Id.*

6 2. The government list, provided to undersigned counsel on June 8,
7 2022, includes Sherry Johnson. Mr. Zeto and Ms. Johnson have been in a personal
8 relationship for several years and plan to marry.

9 3. Mr. Zeto is requesting that the no contact condition be removed as to
10 Ms. Johnson and replaced with a condition that they avoid discussing the case.

11 4. Neither Pretrial Services nor the government object to the requested
12 modification.

13 Wherefore, the parties stipulate that Mr. Zeto's conditions of release be
14 modified to allow him contact with potential witness, Sherry Johnson, under the
15 condition that they not discuss the case.

16 DATED: July 13, 2022.

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18 RENE L. VALLDARES
19 Federal Public Defender

JASON M. FRIERSON
United States Attorney

20 By /s/ Joanne L. Diamond
21 JOANNE L. DIAMOND
22 Assistant Federal Public Defender

By /s/ Daniel E. Zytnick
DANIEL E. ZYTNICK
U.S. Department of Justice

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

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4 UNITED STATES OF AMERICA,

5 Plaintiff,

6 v.

7 MICHAEL ZETO,

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9

Case No. 2:22-cr-0085-GMN-DJA

**STIPULATION TO MODIFY
CONDITIONS OF RELEASE**

10 IT IS THEREFORE ORDERED that Mr. Zeto's conditions of release be
11 modified to allow him contact with potential witness, Sherry Johnson, under the
12 condition that they not discuss the case.

13 DATED this 15th day of July, 2022.

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16 UNITED STATES MAGISTRATE JUDGE
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